

**IN THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

FILED 2012 JAN 2 11  
CLERK OF THE COURT

<b>IN RE: SECOND COMPLAINT OF</b>	)	
<b>DISCOUNT COMMUNICATIONS, INC.</b>	)	<b>DOCKET NO. 00-01151</b>
<b>AGAINST BELL SOUTH</b>	)	
<b>TELECOMMUNICATIONS, INC.</b>	)	

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**PETITION TO INTERVENE**

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Comes Paul G. Summers, the Attorney General & Reporter, through the Consumer Advocate and Protection Division of the Office of Attorney General (hereinafter "Attorney General"), pursuant to Tenn. Code Ann. § 65-4-118(c)(2)(A), and petitions to intervene in this case on behalf of the public interest because consumers may be affected by actions taken in this docket, particularly if actions taken in this docket by BellSouth Telecommunications, Inc. result in or lead to termination of service to customers of Discount Communications, Inc. Such termination could leave customers of Discount Communications, Inc. without telephone service or could mean that such customers would have paid in advance for service they would not later receive from Discount Communications, Inc. Accordingly, if service is terminated, the Attorney General wants to ensure that there is as little disruption as possible in service for Discount Communications, Inc. customers and that such customers not forfeit any money that they have pre-paid for service. For cause, the Petitioner would show as follows:

I.

1. The Consumer Advocate and Protection Division of the Office of the Attorney General is authorized by Tenn. Code Ann. § 65-4-118 (c)(2)(A) to initiate a contested case, and

participate or intervene in proceedings to represent the public interest in accordance with the Uniform Administrative Procedures Act (UAPA).

2. Discount Communications, Inc. purchases telecommunications services from BellSouth Telecommunications, Inc. and markets them to the public in the Memphis area. Discount Communications, Inc. customers pre-pay for these telecommunications services on a monthly basis.

3. A Docket has been opened at the Tennessee Regulatory Authority ("TRA"), Docket No. 00-01151, upon a Complaint filed by Discount Communications, Inc. Upon information and belief, the purpose of this Complaint is to resolve any remaining billing disputes between BellSouth Telecommunications, Inc. ("BellSouth") and Discount Communications, Inc. ("Discount") resulting from the purchase of services by Discount from BellSouth.

4. The Attorney General participated in a related docket item at the TRA involving Discount Communications, Inc. in Docket No. 00-00230. The Attorney General requested intervention in that matter and was granted intervention.

5. During November, 2000 Discount Communications, Inc. filed for bankruptcy protection.

6. If the TRA determines that Discount owes money to BellSouth for the purchase of telecommunications services, and Discount is unable to or otherwise does not pay the amount owing, BellSouth may terminate service to Discount. Thus, the present Docket could result in or lead to, directly or indirectly, the termination of telecommunications service to Discount customers.


7. If telecommunications service is terminated, the Attorney General wants to ensure that

there is as little disruption as possible in telecommunications service for Discount customers and that such customers not forfeit any money that they have pre-paid for service. The Attorney General is also concerned about making certain that customers are given notice and an opportunity to make arrangements for alternate telecommunications before service is terminated. The Attorney General desires the opportunity to advocate for protections for consumers in the unique position of paying for services not yet delivered especially in the context of a financially unstable company. Such protections include but are not limited to, the careful wording of notice to the consumers and, if possible, establishing a transition to another provider of telephone service.

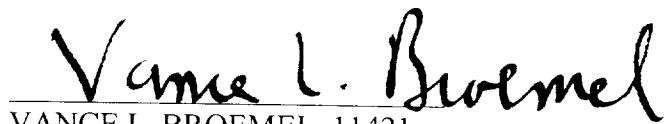
8. Only by intervening and participating in this proceeding can the Attorney General work to protect the public interest.

Wherefore the Petitioner prays that the Authority grant its Petition to Intervene.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paul G. Summers", written over a horizontal line.

PAUL G. SUMMERS, 6285  
Attorney General & Reporter

A handwritten signature in black ink, appearing to read "Vance L. Broemel", written over a horizontal line.

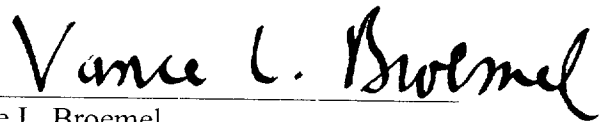
VANCE L. BROEMEL, 11421  
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### Certificate of Service

I hereby certify that a true and correct copy of the Petition to Intervene was served on parties below via U.S. Mail, postage prepaid, this January, 11, 2001.

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Vance L. Broemel  
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